

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
)	
GIUSEPPE MAROTTA et al.,)	
)	
Plaintiff)	
)	
v.)	C.A. NO. 05-10032-MEL
)	
SUFFOLK COUNTY,)	
Defendant)	
_____)	

**JOINT MOTION TO ENLARGE DEADLINES ESTABLISHED
BY JOINT MANAGEMENT PLAN**

Now come the parties to the above-referenced action, and in the related action, *Brown v. Suffolk County*, 05-10188-MEL, move to enlarge all deadlines established by the scheduling order. In support thereof, the parties state that this case involves multiple plaintiffs, and in an effort to resolve this matter, they are involved in a cooperative examination of payroll records of hundreds of plaintiffs which is time consuming and requires additional time to complete.

The parties propose that the deadlines be enlarged as follows:

- Fact Discovery to be completed by December 31, 2006;
- Dispositive Motions to be filed by January 31, 2007;
- Disclosure of Experts by February 28, 2007;
- Trial, May 1, 2007.

Respectfully submitted,

THE PLAINTIFFS

By their attorney,

s/Daniel W. Rice

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s/James Davin

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